ROBERT W. FREEMAN Nevada Bar No. 03062 Email: Robert.Freeman@lewisbrisbois.com PAMELA L. McGAHA Nevada Bar No. 08181 Email: Pamela.McGaha@lewisbrisbois.com CHERYL A. GRAMES Nevada Bar No. 12752 5 Email: Cheryl.Grames@lewisbrisbois.com LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 702.893.3383 FAX: 702.893.3789 8 Attorneys for Defendant State Farm Mutual Automobile Insurance Company 9 UNITED STATES DISTRICT COURT 10 DISTRICT OF NEVADA 11 12 CASE NO.: 2:19-cv-00878-RFB-CWH DONNA ARLENE THELIN, 13 14 Plaintiff. STIPULATION AND ORDER EXTENDING DEADLINE FOR THE FILING OF 15 VS. DEFENDANT STATE FARM MUTUAL **AUTOMOBILE INSURANCE COMPANY'S** 16 STATE FARM MUTUAL AUTOMOBILE RESPONSE TO PLAINTIFF'S AMENDED INSURANCE COMPANY, COUNTRY COMPLAINT (ECF NO. 12) 17 PREFERRED INSURANCE COMPANY. DOES I through X, inclusive; and ROE 18 CORPORATIONS I through X, inclusive, 19 Defendants. 20 IT IS HEREBY STIPULATED AND AGREED, by and between Defendant State 21 Farm Mutual Automobile Insurance Company ("State Farm"), by and through its attorneys 22 of record, the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP, and Plaintiff Donna 23 Arlene Thelin ("Plaintiff"), by and through her counsel of record, THE702FIRM, as follows: 24 Whereas the due date for the State Farm's Response to Plaintiff's First Amended 25 Complaint (ECF No. 12), is currently due on July 26, 2019; 26 Whereas the deadline for State Farm's response to Plaintiff's Motion for Remand 27 (ECF No. 13) is also currently due July 26, 2019; 28

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4836-5625-7949.1

1	Whereas State Farm is concurrently filing its Response to Plaintiff's Motion to
2	Remand wherein State Farm states that while diversity jurisdiction does exist, State Farm
3	does not oppose remand based on Plaintiff's representations that the amount in
4	controversy is less than \$75,000; and,
5	Whereas the decision on Plaintiff's Motion to Remand will determine whether the
6	matter will proceed in this Court or in the Eighth Judicial District, Clark County, Nevada;
7	IT IS HEREBY AGREED that the deadline for State Farm to file its responsive
8	pleading to Plaintiff's Amended Complaint (ECF No. 12) will be extended to fourteen (14)
9	days after the Court's decision on Plaintiff's Motion to Remand (ECF No. 13).
10	This is the parties' first request to extend this deadline, which is made in good faith
11	and not for purposes of delay.
12	DATED this 20 day of July, 2019. DATED this 20 day of July, 2019.
13	The 702 Firm LEWIS BRISBOIS BISGAARD & SMITH LLP
14 15 16 17	By: Michael C. Kane, Esq. Nevada Bar No. 10096 Bradley J. Myers, Esq. Nevada Bar No. 8857 Danielle M. Holt, Esq. Nevada Bar No. 13152 THE702FIRM By: ROBERT W. PREEMAN, ESQ. Nevada Bar No. 03062 PAMELA L. McGAHA Nevada Bar No. 08181 CHERYL A. GRAMES Nevada Bar No. 12752
19	400 S. 7th Street, Suite/Floor 4 Las Vegas, Nevada 89101 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 Atternave for Defendant State Form
20	Attorneys for Plaintiff Attorneys for Defendant State Farm Mutual Automobile Insurance Company
21	ORDER
22	IT IS SO ORDERED.
23	1 August
24	DATED this day of, 2019.
25	
26	UNITED STATES MAGISTRATE JUDGE
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